

***Michael Faillace & Associates, P.C.***

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Marcos Hernandez

November 4, 2021

**Attention:**

File #: ElNuevoAztec

Inv #: Sample

**RE:**

<b>DATE</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>AMOUNT</b>	<b>LAWYER</b>
Oct-26-20	Preparing document for client's signature, call with client instructing him how to sign	0.80	100.00	PL
Oct-27-20	Call with client	0.20	25.00	PL
Dec-07-20	reviewed and corrected the complaint; sent complaint to CS with directions as to the next steps we need to take in the litigation	1.50	675.00	MF
	Call with client, updating case file and reviewing documents	0.30	37.50	PL
	Drafting complaint, due diligence on company, sending over to MF	2.40	300.00	PL
Dec-08-20	reviewed complaint filed in court; directed staff to update case chart ; filed notice in the proper folder for future reference	0.30	135.00	MF
	Finalizing complaint, preparing related documents and e-filing on ECF	1.50	187.50	PL
Dec-09-20	Docketing and serving summons and related documents	0.90	112.50	PL

Dec-14-20	reviewed court notice of appearance of plaintiff's counsel ; directed staff to update case chart ; filed order in the proper folder for future reference	0.30	135.00	MF
	Reviewing and docketing AOS and e-filing	0.70	87.50	PL
	Prepare and file NOA	0.30	37.50	PL
Dec-18-20	Review service of process documents, update case file	0.20	25.00	PL
Dec-21-20	Email to process server re: AOS	0.20	25.00	PL
Dec-28-20	reviewed affidavits of service filed in court ; directed staff to update case chart ; filed affidavits in the proper folder for future reference	0.30	135.00	MF
	Reading email from process server re service of Gilberto Molina	0.20	25.00	PL
	Reviewing and e-filing AOS on individual defendants	0.70	87.50	PL
Dec-30-20	Drafted Notice of Appearance; reviewed file	0.20	80.00	WO
Dec-31-20	Reviewed court notice of appearance of plaintiff's counsel ; directed staff to update case chart ; filed order in the proper folder for future reference	0.30	135.00	MF
	Reviewed court order granting plaintiffs' counsel's motion to withdraw from the case; directed staff to update case chart ; filed notice in the proper folder for future reference	0.30	135.00	MF
	Filed Notice of Appearance	0.10	40.00	WO
Jan-21-21	Reviewed answer to complaint and corporate disclosure statements filed by defendants in court; directed staff to update case chart ; filed notice in the proper folder for future reference	0.50	225.00	MF

Jan-28-21	Reviewed court order referring the case to mediation; directed staff to update case chart ; filed letter in the proper folder for future reference	0.30	135.00	MF
Feb-03-21	Telephone conversation with defense counsel re: status	0.20	80.00	WO
	Reviewed documents provided by defense counsel	0.10	40.00	WO
Feb-18-21	Telephone conversaiton with attorney re: mediation	0.20	80.00	WO
Feb-19-21	Telephopone conversation with defense counsel re: mediation	0.10	40.00	WO
Mar-10-21	Drafted e-mail to SDNY mediaiton office re: status	0.10	40.00	WO
Mar-15-21	Sent e-mail to MF re: defense counsel's position on mediation	0.10	40.00	WO
Mar-17-21	Reviewed damages chart	0.30	120.00	WO
	Sent damages chart to defense counsel	0.10	40.00	WO
Mar-30-21	Sent e-mail to defense counsel re: teleconference	0.10	40.00	WO
Mar-31-21	Telephone counversaiton with defense counsel re: settlement	0.20	80.00	WO
Apr-09-21	Drafted e-mail to defense counsel re: damages / settlement demand	0.10	40.00	WO
	Reviewed damages chart	0.10	40.00	WO
Apr-12-21	Drafted and submitted mediation statement	2.60	1,040.00	WO
	Reviewed file	0.30	120.00	WO
	Reviewed and edited damages chart	0.30	120.00	WO
Apr-19-21	Sent e-mail to mediator re: teleconference	0.10	40.00	WO
Apr-22-21	Attended Mediation	3.50	1,400.00	WO

	Reviewed file to prepare for mediaiton	0.50	200.00	WO
Apr-29-21	Drafted Settlement Agreement	1.70	680.00	WO
Apr-30-21	Reviewed and forwarded settlement agreement to defense counsel	0.70	280.00	WO
May-04-21	Drafted fairnness letter to the Court	1.10	440.00	WO
May-07-21	Drafted and filed letter with the court re: extension to file settlement agreement	0.30	120.00	WO
	Revised settlement agreement	0.30	120.00	WO
May-12-21	Revised settlement agreement	0.20	80.00	WO
May-14-21	Drafted and filed letter with the court re: extension to file settlement agreement	0.30	120.00	WO
May-20-21	Revised settlement agreement	0.40	160.00	WO
May-21-21	Drafted and filed letter with the Court re: extension to file settlement agreement	0.30	120.00	WO
May-26-21	Telephone conversaiton with defense counsel re: status	0.30	120.00	WO
May-27-21	Drafted letter to the Court requesting a conference	0.50	200.00	WO
Jun-23-21	Drafted case management plan and sent same to defense counsel	0.40	160.00	WO
Jun-24-21	Filed case management plan	0.20	80.00	WO
	Attended case management conference	0.30	120.00	WO
Jul-23-21	Drafted and served discovery demands	2.20	880.00	WO
Jul-26-21	Drafted e-mail to defense counsel re: settlement	0.10	40.00	WO
Aug-02-21	Drafted e-mail to defense counsel re: settlement	0.10	40.00	WO
Aug-06-21	Drafted e-mail to defense counsel re: settlement	0.10	40.00	WO

Sep-02-21	Drafted and served deficiency letter	0.70	280.00	WO
Oct-05-21	Left message for defense counsel re: discovery issue	0.10	40.00	WO
Oct-07-21	Sent e-mail to defense counsel re: discovery issue	0.10	40.00	WO
Oct-08-21	Sent e-mail to defense counsel re: discovery issue	0.10	40.00	WO
Oct-12-21	Drafted and filed motion for a discovery conference	1.10	440.00	WO
Oct-19-21	Drafted e-mail to defense counsel re: settlement	0.10	40.00	WO
Oct-21-21	Revised settlement agreement	0.20	80.00	WO
Oct-29-21	Drafted and filed letter with the Court re: settlement	0.30	120.00	WO
Oct-31-21	Reviewed and filed submission re: Cheeks review	0.70	280.00	WO
	Totals	34.40	\$11,640.00	

DISBURSEMENTS

	Filing Fee	402.00	
Dec-14-20	Process Server Fee	76.00	
	Process Server Fee	76.00	
Dec-28-20	Process Server Fee	90.00	
	Process Server Fee	90.00	
	Totals	\$734.00	
	<b>Total Fee &amp; Disbursements</b>		<b>\$12,374.00</b>
	<b>Balance Now Due</b>		<b>\$12,374.00</b>